

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ORIGINAL COPY

BOBBY LEE HARRISON

RECEIVED

SEP 2 2008
SEP 2, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 08C 0920

(To be supplied by the Clerk of this Court)

COUNTY OF COOK, ILLINOIS, and

THOMAS DART,

SALVADOR GODINEZ,

CHESTER PLAXICO

JUDGE: KENNELLY

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

FIRST AMENDED COMPLAINT

CHECK ONE ONLY:

☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐ OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: BOBBY LEE HARRISON
- B. List all aliases: ACE
- C. Prisoner identification number: 2004 007 2892
- D. Place of present confinement: COOK COUNTY DEPARTMENT OF CORRECTION
- E. Address: 2600 S. CALIFORNIA AVENUE, CHICAGO, ILLINOIS 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: COUNTY OF COOK, ILLINOIS ("Cook County"), and Thomas Dart
 Title: in his official capacity as the Sheriff of Cook County
 Place of Employment: COOK County Department of Corrections
- B. Defendant: Salvador Godinez, in his individual and official capacities as
 Title: Executive Director of the Cook County Department of Corrections
 Place of Employment: COOK County Department of Corrections
- C. Defendant: Chester Plaxico, in his individual and official capacities as
 Title: Superintendent of the Division Ten (10)
 Place of Employment: COOK County Department of Corrections

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

1. List All lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

A. Name of case and docket number: BOBBY LEE HARRISON
HORAN & HORAN Interprise OGC 4730

B. Approximate date of filing lawsuit: August 31, 2006

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ACC
First & Only Bobby Lee Harrison

D. List all defendants: HORAN & HORAN

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

F. Name of judge to whom case was assigned: DER-YEGHAYAN

G. Basic claim made: _____

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?):
This case was dismissed, and was not appeal, due to being incarcerated

I. Approximate date of disposition: _____

A. Name of case and docket number: BOBBY LEE HARRISON V. COUNTY OF COOK, Illinois, and THOMAS DART, Case # DTC 0300

B. Approximate date of filing lawsuit: January 17, 2007

C. List all plaintiffs (if you had co-plaintiff), including any aliases: ACC

D. List all defendants: COUNTY OF COOK, Illinois, and THOMAS DART

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county):
UNITED STATE DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

F. ~~_____~~
 Name of judge to whom case was assigned: The Honorable Judge MATTHEW P. KENNEDY

G. Basic claim made: _____

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?) (Pending)

I. Approximate date of disposition: _____

1. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

A. Name of case and docket number: Bobby Lee Harrison, v. County of Cook, Illinois, THOMAS DART. Case #. OBC 2140

B. Approximate date of filing lawsuit: _____

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ACE

D. List all defendants: COUNTY OF COOK, ILLINOIS, THOMAS, SALVADOR GODINEZ, SALVADOR GODINEZ-VILLANUEVA, L. HOPPER, CARMELLA K. RICHARDSON, MARETTA C. LAKE, and Ms. JONES.

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the County): _____

F. Name of Judge to whom case was assigned Honorable Judge: MATTHEW. J. KENNELLY.

G. Basic claim made _____

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

I. Approximate date of disposition: _____

A. Name of case and docket number Bobby Lee Harrison, v. County of Cook, Illinois,

B. Approximate date of filing lawsuit: _____

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ACE

COUNTY OF COOK, ILLINOIS & THOMAS DART, SALVADOR GODINEZ, SCOTT KURTAVICH

D. List all defendants: COUNTY OF COOK, ILLINOIS & THOMAS DART, SALVADOR GODINEZ, SCOTT KURTAVICH, NELSON VILLANUEVA, D. ANDREWS, and Sgt. TAYLOR.

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the County): _____

F. _____

G. Name of Judge to whom case was assigned: _____

H. Basic claim made _____

I. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

J. Approximate date of disposition: _____

I Couldn't find the other 2 cases no.

Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved including names, date, and. Do not give any legal argument or cite any cases or statutes. If you intend to allege number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary)

I HAVE SUFFERED FROM A MENTAL ILLNESS MY ENTIRE LIFE. MY INSTABILITY HAS SINCE WARRANTED A STATE OF DEPRESSION, AND HAS LED TO EXTREME EMOTIONAL ANXIETIES AND CHRONIC MOOD SWINGS, AND ALSO FEELINGS OF DEPRESSION THAT HAS PROMPTED A LACK OF CONCENTRATION & ANTI-SOCIAL BEHAVIOR. THIS HAS BEEN APPARENT EVEN SINCE MY BIRTH. I HAVE A HISTORY OF LEARNING DISABILITIES, WHICH DOES INABLE ME TO FUNCTION AS WELL AS NORMAL PEOPLE... "WHILE LIVING IN FRANKLIN, GEORGIA, I WAS ATTENDING MARY JOHNSON HIGH SCHOOL. THEY LATER CHANGED NAME TO HERD COUNTY ELEMENTARY. BY ATTENDANCE, WAS PLACED IN A SPECIAL EDUCATION SETTING AMONG OTHER SPECIAL ED STUDENTS. I WAS DIAGNOSED WITH A MENTAL COMPETENCE DEFICIENCY. IN MONTH OF JANUARY 2005, AT CERMAK HEALTH SERVICES PROVIDED ME WITH A ROUTINE PHYSICIAN'S PSYCHIATRIST. WHO EVALUATED ME AND HAD DISCOVERED THAT SUCH CONDITIONS DOES EXIST. IN HIS FINDINGS HAD FURTHER DETERMINED THEY WERE INDEED CHRONIC. THE MEDICATIONS PRESCRIBED WERE TRASIDONE, AND PROZAC. I WAS TRANSFERRED TO A MEDICAL TIER AND PLACED INTO CELL WITH ANOTHER PATIENT. TIER'S ARE PRESENTLY 35 FEET PER SQUARE INCHES IN TOTAL SPACE. FEB. 2007 BY APPROXIMATION, IN DIVISION (1-2 G) TIER - THE EXECUTIVE DIRECTOR SALVADOR GONZALEZ PLACED DIV. (1-9) TIER ON AN OFFICIAL LOCKDOWN THE EXCEPTIONS WERE SCHOOL WINNERS, AND TIER'S CONDUCTIVE FOR KITCHEN LABORERS. THESE TIER'S NEVER FOLLOWED SUIT TO STAFFS CONDUCT. SUPT. VILLELIEVA'S RESPONSE CONFIRMS THE CONDUCT OF THE ADMINISTRATORS, STATELY, THAT IT WAS ILLEGAL AND IN FULL CONSIDERATION BECAUSE WE WERE ON PSYCHOTROPIC MEDS. AS A RESULT OF STAFFS CONDUCT PATIENTS BECAME DISTURBED, AND BEGIN TO SLAM THEIR PROPERTY BOXES AGAINST STEEL BED FRAMES AND TOILETS, THE NOISE, I COULDN'T ENDURE CAUSED CHRONIC HEADACHES & LACK OF SLEEP. I REQUESTED AN EVALUATION FOR OVER TWO WEEKS STRAIGHT. NURSE HOLTSWORTH SAID I MIGHT AS WELL GET USE TO THE LOCK DOWN. INSINUATED THAT IT WOULD NOT BE THE LAST. NOR, ANY RELIEF UNDER THESE CIRCUMSTANCES. THE MEDICAL STAFF WERE AWARE OF MY CONDITIONS AND DID NOTHING TO ADDRESS THEM. I HAD OVERDOSED ON TRASIDONE TO INDUCE SLEEP. THIS PROMPTED THE RISK OF SUICIDE. DURING EACH STAGE OF ADDED AFFLICTIONS, I REMAINED SLEEP FOR OVER (48) HOURS. I AGAIN ASKED NURSE HOLTSWORTH FOR AN EVALUATION. FURTHER EFFORTS TO OBTAIN RELIEF WERE DENIED.

THERE IS RECENTLY NO USE OF HOT WATER IN THE CELLS. THE SHOWERS ARE IN OPERATION. YET, THE TEMPERATURE IS NOT ADEQUATE. IN JULY 2007, WE WERE TRANSFERRED BACK TO DIVISION (D) AND PLACED IMMEDIATELY BACK ON LOCK DOWN. THE CELLS ARE DIRTY, PROPER CLEANING SUPPLIES WERE NOT ISSUED ON A DAILY BASIS IN ORDER TO SALVAGE UNSANITARY LIVING CONDITIONS. FLIES & INSECTS, MOICE ARE OFTEN CRAWLING UPON THE CELL WALLS & BASE OF TOILET AREAS. THERE ARE NO MIRRORS INSIDE THE CELLS OR AMPLE USE OF DESK SPACE. INADEQUATE VENTILATION & LIGHTING CONDITIONS ARE ALSO IN EXCESS. PREVENTING PRO'SE LITIGANTS FROM PREPARING LEGAL DOCUMENTS & ETC. DUE TO THE BURNING OF MILK CARTONS FAIRLY OFTEN, VENTILATION IS FURTHER AFFECTED: CARBON-DIOXIDE DEPOSITS FOOD HEADACHES & DIZZINESS ETC. SHORTNESS OF BREATH. THE CONDITIONS CREATE FREQUENT CONGESTION & PNEUMONIA WHICH HAS LED TO CHRONIC RESPIRATORY ILLNESS. IVE PROMPTED REQUESTS OFTEN IN ADDRESS ON ISSUES TO SUP. PLAYCO. "SO MY REQUESTS WERE MERELY TRIVIAL ACCORDING TO PLAYCO. HE SAID UNLESS I HAD A CHRONIC CONDITION THAT WOULD REQUIRE SPECIAL HOUSING, I WOULD REMAIN ON ASSIGNED TIER. "I WAS IMPLYING BY REQUEST TO ENSURE THAT A MEDICAL ISSUE OF THE SORT WOULD NOT REACH ITS TOLL. THEREBY, HE EVADED IN DESPAIR & DID NOT RETURN TO CONFRONT THE ISSUES. WHICH MY ALLEGATIONS SHOULDVE BEEN TAKEN LITERALLY. I REQUESTED TO BE MOVED FROM THE ENVIRONMENT THAT I WAS IN. AND TO BE PLACED IN AN AREA (TIER) THAT'S MORE CONDUCTIVE FOR MY HEALTH. IVE INCLUDED GRIEVANCES AND APPEALS AS PROOF AS A NOTICE TO BE ENTERED AS EXHIBIT (A).

COUNT 2# DENIAL OF LAUNDRY SERVICES

SINCE THE MONTH OF SEPTEMBER 2006. IT HAS BEEN ACTUATED AS AN ABUSE OF DISCRETION WHEREBY, DENIAL OF LAUNDRY SERVICES IN TERMS ON HOW ACCOMODATIONS IN THE CITERAC SENSE THUS: LACK OF AVAILABLE DETERGENT FOR INDIGENT DETHNEES. FOR USE THAT MAY ADEQUATELY MEET HYGIENIC NEEDS. CLOTHING IS HAND WASHED INSIDE OF TOILETS. IT DEFYS LOGIC NOT TO BE AFFORDED USEFUL CLEANING SUPPLIES, ESPECIALLY WITH PERSONAL HYGIENE. WERE NOT ALLOWED TO FORM CLOTHING LINES WHICH ARE CONVICIENT FOR HANGING CLOTHING BECAUSE ONCE THEYRE WASHED THEY NEED TO BE HUNG IN ORDER TO INDUCE DRYING. WERE EXPOSED TO HARMFUL BACTERIA BECAUSE OF LACK IN CLEANING SUPPLIES & USING THE TOILET STOOL FOR ANY GENERAL PURPOSES. WHEN TOILETS ARE MAINLY FOR EVACUATING WASTE. FROM THE HUMAN BODY.

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I'VE FILED NUMEROUS COMPLAINTS BY WAY OF CORRESPONDENCE, APPEALS AND HAVE WRITTEN FORMAL LETTERS AS STRAIGHT TO MY ALLEGATIONS. MY EFFORTS HAVE IN FACT REFLECTED AN EXHAUSTIVE MEASURE. PER: WITH MY SINCERE REGARDS I'VE PERCEIVED THAT THE COUNTY JAIL ISN'T A MULTI-PURPOSE CENTER. YET HYGIENE & CLEANING ARE ESSENTIAL, BESIDES THE AVAILABLE NEED FOR LAUNDRY TO BE ADDRESSED IN ITS ENTIRETY. I'VE ENTERED THESE COPIES AS EXHIBIT (B.) FOR PROOF OF MY ALLEGATIONS....

COUNT 3rd DENIAL OF OUTDOOR EXERCISE

FROM JANUARY 2007, THROUGH DECEMBER 2007 I'VE ONLY HAD THE PRIVILEGE TO EXERCISE OUTDOORS TOTALING (8)th TIMES FROM JANUARY 2008, THROUGH AUGUST 2008, ONLY (7)th TIMES. TIME ALLOWED WAS STIPULATED AS BEING WITHIN THE FRAME OF AN HOUR. THE ACCESSIBLE LIMIT FOR OUR LEISURE ACTIVITIES OUT OF THE BUILDING. AND FOR THIS TIME LIMIT TO REFLECT SOLELY THE HOUR REQUIRED. I CONTEST TO THIS ABUSE OF DISCRETION MAINLY BECAUSE IT DOESN'T MAKE LOGICAL SENSE TO HAVE APPROPRIATED IN TERMS OFTEN AS STAFF MAY INFER. THE TIME IN ROUTE WHILE LEAVING THE TIER, STATING THAT THE TIME SPENT & TIME IN ROUTE BACK TO TIER, IS SUPPOSED TO CONSTITUTE THE COMPLETE HOUR OF RECREATION. DETAINEES' ADEQUATE OUTDOOR EXERCISE HASN'T BEEN TAKEN LITERALLY. STAFF HAS THUS REMAINED RELAXED WITH THEIR RESPONSIBILITIES AS THEY MUST JUSTLY REFLECT THE ORDER OF THE INSTITUTION'S POLICY. AS THEY RELATE TO PROPER OUTDOOR EXERCISE AND TO HAVE EXACTED TO ALLOW REASONABLE TIME TO DO SO. . . . LACK OF SUNLIGHT & CHRONIC BACK PAIN, DUE TO THE NEGLECT OF NORMAL & FREQUENT OUTDOOR EXERCISE. MY LEGS HAVE SINCE BEEN CRAMPING. I WAS PRESCRIBED MUSCLE RELAXERS & PAIN MEDICATION. MY GENERAL HEALTH HAS FAILED ME DUE TO THE ADMINISTRATORS NOT MAKING THE NECESSARY ADJUSTMENTS FOR ADEQUATE RECREATIONAL ACTIVITY OUT OF BUILDING..

COUNT 4th IMPROPER HYGIENIC ACCESSORIES

THE DENIAL OF IMPROPER LINEN EXCHANGES & CLOTHING HAS BEEN FOUNDED IN REFUTE BY ADMINISTRATORS. I'VE EXERCISED IN TERMS FOR OBTAINING RELIEF, YET, MY ATTEMPTS HAVE REMAINED SORTED OUT THROUGH SEVERAL AMOUNTS OF PAPER WORK, & A STAGE FOR MENTAL GYMNASTICS. AS THE STRESS FROM STAFF'S LACK OF APPROPRIATELY GIVING NOTICE TO MY COMPLAINTS HAS WOUNDED MY CONSCIENCE. I'VE FILED GRIEVANCES ON EACH ISSUE & HAVE FOLLOWED THROUGH WITH THE PROCESS FOR APPEALS. ALL ARE POSTDATED IN WRITING, AS FAR BACK AS THE YEAR 2006... WE ARE ONLY ALLOWED A CHANGE OF UNIFORMS ON OCCASION, INCLUDING LINEN, AND TOWELS: AROUND FOUR TO SEVEN WEEKS APART. WE HAVE NO ACCESS TO MACHINES, OR APPLIANCES FOR US TO WASH CLOTHING ITEMS. PER: T-SHIRTS, UNDERWEAR, ETC. IT'S CLEARLY NO RELIABLE JUSTIFICATION FOR THE DELAYS, DESPITE ALL THE GRIEVANCES, AND APPEALS THAT HAVE BEEN WRITTEN. I'VE NOT YET RECEIVED AN ADEQUATE RESPONSE. THE BLIND DAGGER WITHIN THE JUSTICE SYSTEM IS YET RAMPLANT IN THE COUNTY JAIL. AND HAS NOW WOUNDED THE MINORITY AT LARGE. FOR EXAMPLE ON (9-25, 2007) THE SUPERINTENDENT CHESTER FLAKES'S RESPONSE STATES: BE ADVISED, THAT CLOTHING EXCHANGES ARE CONDUCTED ON A WEEKLY BASIS. HOWEVER, A TOWEL SHORTAGE & DAMAGED SHEETS HAS ACCUMULATED. AN EVIDENT CAUSE FOR LACK OF FREQUENT LINEN EXCHANGES ETC. THIS INFORMATION WHETHER THE STAFF CAN SUPPORT ITS STATEMENTS OR NOT, DOES NOT IN ANY WAY EXCUSE THEM FROM SUCH CONDUCT. THE TENDENCIES TO EVADE THE CRITERIA FOR PROPER HYGIENE. THUS: THE ELEMENTS IN SUPPORT OF PROPER HYGIENIC NEEDS AND FUNCTIONS, ARE BED LINEN, AND A CHANGE OF CLOTHING ON A WEEKLY BASIS. DIRTY LINEN CAUSES SORES TO FORM ON MY BODY. & ALLERGIC REACTIONS & RASHES...

CLAIM FOR RELIEF

COUNTS 1-2 & 3 EXHIBITS E & H

DUE-PROCESS CLAIM AGAINST COOK COUNTY JAIL
UNDER 42-U.S.C. §1983

CLAIM FOR INTENTIONAL AFFLICTION OF EMOTIONAL DISTRESS
DUE TO UNCONSTITUTIONAL LOCK DOWN, DEPRIVATION AGAINST COOK
COUNTY & THE SHERIFF IN THEIR OFFICIAL CAPACITY.

SALVADOR GONINEZ, AND CHESTER PLACED IN THEIR INDIVIDUAL &
OFFICIAL CAPACITY, AS EXECUTIVE DIRECTOR AND SUPERINTENDENT OF
THE COOK COUNTY DEPT. OF CORRECTIONS,

(1) THE PLAINTIFF REPENTS FROM ANY OVER STATEMENT THAT IS NOT
AN AGENCY TO HIS ALLEGATIONS, AND RE-ALLEGES ALLEGATIONS BEING
(1-2-3) —

(2) THE ILLEGAL LOCKDOWN AND UN'SANITARY LIVING CONDITIONS
DENIAL OF OUTDOOR EXERCISE & LAUNDRY SERVICES... THESE ARE
TO BE NOTED AS OBJECTIVELY SERIOUS DEPRIVATIONS. PLAINTIFFS
MENTAL ILLNESSES AND HIS PHYSICAL INJURIES HAVE BEEN ALL
DIAGNOSED BY (CHS) PHYSICIANS AND THE DISPENSARY PHYSICIANS
AS MANDATING REQUIRED IMMEDIATE MEDICAL ATTENTION.

(3) DEFENDANTS ARE AWARE OF THE PLAINTIFFS HEALTH & JAIL CONDITIONS
BUT HAVE DELIBERATELY DISREGARDED AND IGNORED, THE EXCESS-
IVE RISK & ENDANGERMENT.

(4) THE COOK COUNTY JAIL HAS FAILED TO INSTITUTE CONSTITUTIONAL
-ALLY SO ADEQUATE PROCEDURES TO ENSURE THAT DETAINEES LIVING
CONDITIONS, EVALUATIONS & EXERCISE ETC. LAUNDRY SERVICES ARE
NOT PROVIDED. COOK COUNTY HAS DELIBERATELY AND SYSTEMATICALLY
REVEALED INDIFFERENCE, AND FAILED TO ACT UPON EVIDENCE OF PLAINTIFFS
ALLEGATIONS. & HAS FAILED THIS: TO FOLLOW THROUGH WITH REQUESTS
FOR PHYSICIANS OF (CHS) PROVIDERS DESPITE THE COOK COUNTY STAFF
AND THE GRIEVANCE'S APPEALS ETC. BOARD RESPONSE.

(5) THIS WIDESPREAD PRACTICE, POLICY, OR CUSTOM CONSTITUTES DELIBERATE
INDIFFERENCE TO THE PLAINTIFFS CONDITION & NEEDS OF (C.C.D.C.) —
DETAINEES. AND FALLS BELOW THE CONSTITUTIONAL MINIMUM FOR
DUE PROCESS TO BE OF GUARANTEED RESULTS, FOR DETAINEES BY THE
ATTENTION GIVEN TO THE UNITED STATES CONSTITUTION.

(6) THE SHERIFF ALSO HAS FAILED TO INSTITUTE ADEQUATE CLOTHING
EXCHANGES TO PREVENT HAZARDOUS HEALTH. A DIRECT & PROXIMATE RESULT
OF DEFENDANTS DELIBERATE INDIFFERENCE TO MY HYGIENIC NEEDS
AND GENERAL HEALTH I SUFFERED SEVERE AND EXTREME EMOTIONAL
DISTRESS DEFENDANTS ARE IN VIOLATION OF THE 14TH AMENDMENT OF THE
U.S. CONSTITUTION.

STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENTS. CITE NO CASE, OR STATUTES:

A PRAYER FOR RELIEF

WHEREFORE: PLAINTIFF RESPECTFULLY PRAYS THAT THIS COURT,

⊗

→ (1.) TO ISSUE A PRELIMINARY INJUNCTION REQUIRING THE COUNTY OF COOK, THOSE IN QUESTION BEING WITHIN THE STATE OF ILLINOIS ARE THOMAS J. DART IN HIS OFFICIAL CAPACITY AS SHERIFF OF COOK COUNTY DEPT. OF CORRECTIONS, ALONG WITH SALVADOR GORDINEZ IN HIS INDIVIDUAL AND OFFICIAL CAPACITY, DEEMED AS THE EXECUTIVE DIRECTOR OF THE COOK COUNTY JAIL, ALONG WITH CHESTER FLAXICO IN HIS INDIVIDUAL AND OFFICIAL CAPACITY, ACTING AS THE SUPERINTENDENT OF DIVISION (D) OF THE COOK COUNTY DEPT. OF CORRECTIONS, TO ORDER THESE DEFENDANTS TO TAKE THE MEDICAL PSYCHIATRIC PATIENTS OFF THE ILLEGAL LOCKDOWN IN DIVISION (D) AND TO ORDER WHATEVER MEDICINE, AND PSYCHIATRIC, OR PSYCHOLOGICAL TREATMENT NEEDED. AND TO ADDRESS PATIENTS HYGIENIC NEEDS, AND TO MAKE ALL THE NECESSARY ADJUSTMENTS NEEDED AS WELL. AND THAT THERE BE STANDARDS JUSTLY APPROPRIATED TO EMPLOY SAFE LIVING CONDITIONS. THOSE THAT DO NOT REFLECT A LACKING IN CREDIBILITY, IN TERMS OF SOLIDIFYING ALL AVAILABLE MEANS, OF WHICH, WOULD MEET THE CONSTITUTIONAL MINIMUM REQUIREMENT FOR PSYCHIATRIC PATIENTS.

→ (2.) TO APPOINT A LAWYER TO REPRESENT HIM IN THIS CIVIL RIGHTS CASE AND FOR ALL COURT COSTS, AND ASSESSMENT OF ATTORNEY FEES BE RENDERED IN SUPPORT OF PLAINTIFF.

→ (3.) TRIAL BY JURY, AND FOR RELIEF IN COMPENSATORY, NOMINAL, & PUNITIVE DAMAGES, AVAILABLE AND BEING PROPER UNDER THESE CIRCUMSTANCES, BEGINNING WITH THE AMOUNT OF \$100,000 DOLLARS PLAINTIFF DEEMS THIS TO BE A CONSIDERABLE AMOUNT. DEFENDANTS ALSO SHOULD BE HELD LIABLE FOR PLAINTIFFS EMOTIONAL AND PSYCHOLOGICAL ABUSE SUFFERED, & PHYSICAL INJURIES IN LIGHT OF CLOSURE FROM INJUNCTIVE RELIEF. PLAINTIFFS INJURIES THUS, REFLECT TERMINAL POSSIBILITY, AND FOR DEFENDANTS IN QUESTION TO SUFFER SUIT IN INDIVIDUAL CAPACITIES NOW, TO BE EXACTED BY PENALTY NOW, JOINTLY & SEVERELY.

EXHAUSTED ALL REMEDIES ON ISSUES

→ PLAINTIFF HAVE EXHAUSTED ALL AVAILABLE ADMINISTRATIVE REMEDIES REGARDING SUCH MATTERS AS THEY NOW EXPECTED RELIEF DESCRIBED IN COMPLAINT IVE WRITTEN APPROXIMATELY 80 LETTERS TO VARIOUS ORGANIZATIONS, AND RANDOMLY SELECTED AGENCIES AND HAVE SINCE OUTLINED THE DILIGENT CONDUCT THAT HAS PREVIOUSLY BEEN ACTUATED BY OFFICIALS WHO ARE IN QUESTION TO ADDRESS ALLEGATIONS. DEPRIVATIONS IVE SUFFERED FOR THE PAST TWO YEARS 2ND IVE FILED NUMEROUS GRIEVANCES & APPEALS PERTAINING TO OF CALISE IN EXCESS. TO BE ENTERED AS EXHIBIT (A) - B, C, AND D... EXHIBITS ARE ATTACHED.

CERTIFICATION

→ BY SIGNING THIS COMPLAINT I AM OULY SWORN, AND ATTEST TO THE FACTS STIPULATED IN THIS COMPLAINT BEING TRUE AND TO THE BEST OF MY KNOWLEDGE, THIS ON INFORMATION AND BELIEF. I UNDERSTAND THAT IF THIS CERTIFICATION IS NOT PRECISE I MAY BE SUBJECT TO SANCTIONS THROUGH THE COURT.

→ COOK COUNTY DEPARTMENT OF CORRECTIONS
P.O. BOX 089602

CHICAGO ILLINOIS - 60608

→ ADDRESS OF PLAINTIFF

SIGNED THIS 25TH DAY OF AUG. 2008

Bobby Lee Harrison

SIG OF PLAINTIFF....

Bobby LEE HARRISON, ID# 20040072892

PRINTED NAME